

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

CIVIL NO. 5:23-CV-00057

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	VERIFIED COMPLAINT FOR
)	FORFEITURE <i>IN REM</i>
APPROXIMATELY \$140,000.00 IN)	
U.S. CURRENCY seized from Dante)	
Rashaun Ramseur on or about May 23,)	
2022, in Catawba County, North)	
Carolina,)	
)	
Defendant.)	

NOW COMES the United States of America, Plaintiff herein, by
Dena J. King, United States Attorney for the Western District of North Carolina, in
a civil cause of forfeiture, and respectfully states the following:

NATURE OF ACTION

1. This is a civil action *in rem* against approximately \$140,000.00 in
United States Currency (“the Defendant Currency”) seized from Dante Rashaun
Ramseur on or about May 23, 2022, in Catawba County, North Carolina.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over this action pursuant to
28 U.S.C. §§ 1345 and 1355.

3. This Court has *in rem* jurisdiction over the Defendant Currency, and venue is proper pursuant to 28 U.S.C. § 1355(b)(1) because acts or omissions giving rise to the forfeiture occurred in the Western District of North Carolina.

4. Venue is also proper pursuant to 28 U.S.C. § 1395 because the Defendant Currency is located in the Western District of North Carolina.

5. The Defendant Currency was seized within and is now within the Western District of North Carolina.

BASIS FOR FORFEITURE

6. This civil action is brought against the Defendant Currency because it constitutes money furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. §§ 841 and/or 846, proceeds traceable to such an exchange, and/or money used or intended to be used to facilitate a violation of 21 U.S.C. §§ 841 and/or 846, and is therefore subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

FACTS

Background

7. During the relevant time period, Mr. Ramseur was a distributor of cocaine in Hickory, North Carolina.

8. Mr. Ramseur has a prior criminal history, including prior convictions for voluntary manslaughter and felony possession of cocaine.

9. On August 26, 2021, during a traffic stop, investigators with the Catawba County Sheriff's Office seized \$34,000 in U.S. Currency and a cellular telephone from Mr. Ramseur.

10. Mr. Ramseur did not file an administrative claim with the Enforcement Administration ("DEA") challenging the seizure of the \$34,000 in U.S. Currency, and the currency was administratively forfeited.

11. On March 15, 2022, investigators with the Catawba County Sheriff's Office identified a vehicle belonging to Harold Lee Jackson at Mr. Ramseur's residence. Mr. Jackson is a known convicted drug trafficker from Iredell County. While conducting surveillance, investigators saw Mr. Jackson meet with Mr. Ramseur and retrieve a box from Mr. Ramseur's garage.

12. After Mr. Jackson departed from Mr. Ramseur's residence, investigators followed and stopped his vehicle. Investigators deployed a trained and certified narcotics K-9, which positively alerted to the vehicle. During a search of the vehicle, officers located approximately a half kilogram of powdered cocaine vacuum sealed in the same box that Mr. Jackson had removed from Mr. Ramseur's garage.

13. That same day, investigators obtained and executed a search warrant for Mr. Ramseur's residence. During the search of his residence, officers located a small quantity of marijuana, \$3,000.00 in cash, two firearms, and a vacuum sealer in the kitchen that tested positive for cocaine.

14. Investigators continued to conduct surveillance on Mr. Ramseur. His vehicle was seen at residences known to be used to facilitate drug trafficking.

Seizure of the Defendant Currency

15. On May 23, 2022, investigators with the Catawba County Sheriff's Office conducted a traffic stop on a 2015 GMC Yukon Denali for speeding and window tint violations. Mr. Ramseur was operating the vehicle and Crystal Carroll Ramseur was the passenger.

16. During the traffic stop, a trained and certified narcotics K-9 positively alerted to the presence of the odor of narcotics at both the back left passenger door and the left side of the trunk/hatch door.

17. During a search of the vehicle, officers located a black metal container in an open cavity under the back left cup holder in the third row seats. The Defendant Currency was located in the black metal container. Additionally, officers located a Nokia flip phone in the middle floorboard of the second row seats, and two iPhones in the center console under the vehicle radio.

18. Investigators seized the black metal container containing the Defendant Currency and transported it to the Catawba County Sheriff's Office. That same day, another trained and certified narcotics K-9 was deployed and positively alerted to the presence of narcotics on the container in which the Defendant Currency was stored.

19. The Defendant Currency was organized in fourteen banded stacks, consisting mostly of \$100 bills.

APRIL 2023 FEDERAL INDICTMENT

20. On April 18, 2023, a federal grand jury in the Western District of North Carolina returned a multi-count indictment that charges Mr. Ramseur with numerous federal drug offenses. Specifically, the indictment charges Mr. Ramseur with cocaine distribution violations arising from transactions that occurred on September 12, 2022, October 5, 2022, October 24, 2022, November 16, 2022, and January 26, 2023. The indictment also charges Mr. Ramseur along with two other individuals with a conspiracy to distribute and possess with intent to distribute cocaine spanning from at least January 2023 through February 13, 2023.

ADMINISTRATIVE FORFEITURE

21. DEA timely adopted the seizure of the Defendant Currency and initiated an administrative forfeiture action against the Defendant Currency.

22. On August 10, 2022, Mr. Ramseur filed a claim as to the Defendant Currency.

23. In accordance with an extension of time that the Court granted, the United States now timely files this Complaint in response to Mr. Ramseur's claim.

24. The following persons may have or claim an interest in the Defendant Currency:

Dante Rashaun Ramseur
Crystal Carroll Ramseur

CONCLUSION

25. By virtue of the foregoing, all right, title, and interest in the Defendant Currency vested in the United States at the time of the commission of the unlawful act giving rise to forfeiture, 21 U.S.C. § 881(h), and has become and is forfeitable to the United States of America.

PRAYER FOR RELIEF

WHEREFORE, the United States of America respectfully prays the Court that:

- (1) a warrant for the arrest of the Defendant Currency be issued;
- (2) due notice be given to all parties to appear and show cause why the forfeiture should not be decreed;

(3) judgment be entered declaring the Defendant Currency to be condemned and forfeited to the United States of America for disposition according to law; and

(4) the United States be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action, including but not limited to the expenses of maintenance and protection of the Defendant Currency as required by 28 U.S.C. § 1921.

Respectfully submitted this 4th day of May, 2023.

DENA J. KING
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VERIFICATION

I am a Task Force Officer with the Drug Enforcement Administration and one of the agents assigned to this case. Pursuant to 28 U.S.C. § 1746, I hereby verify and declare under penalty of perjury that the foregoing is true and correct to the best of knowledge, information, and belief.

Date: 5-4-2023

s/ Kyle Lawrence
Kyle Lawrence
Task Force Officer